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6 Attorneys for Defendant  
7 Aleksandr Suris

8  
9 **IN THE UNITED STATES DISTRICT COURT**  
10 **CENTRAL DISTRICT OF CALIFORNIA**

11 UNITED STATES OF AMERICA,  
12  
13 Plaintiff,

14 v.

15 ALEKSANDR SURIS and MAXIM  
16 SVERDLOV,  
17 Defendants.

CASE NO. CR 17-420(A)-SJO

**DEFENDANT SURIS' *EX PARTE***  
**APPLICATION TO MODIFY**  
**CONDITIONS OF RELEASE;**  
**DECLARATION OF MICHAEL D.**  
**DRISCOLL**

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20 Defendant Aleksandr Suris, by and through his attorneys of record, hereby  
21 submits this *ex parte* request to modify his conditions of release to allow him to  
22 travel to Big Bear Lake, California, from September 27 to 30, 2019. If granted,  
23 Mr. Suris shall contact his Pretrial Services Officer within 24 hours of his  
24 departure on September 27<sup>th</sup> and his return on September 30<sup>th</sup>.

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1        This request is based on the attached declaration of Michael D. Driscoll and  
2 all pleadings and proceedings in this matter.

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4 DATED: September 17, 2019

Respectfully submitted,

5 LAW OFFICES OF RICHARD M. STEINGARD  
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7 /s/

8 RICHARD M. STEINGARD

9 MICHAEL D. DRISCOLL

10 Attorneys for Defendant

11 ALEKSANDR SURIS  
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**DECLARATION OF MICHAEL D. DRISCOLL**

I, Michael D. Driscoll, state and declare as follows:

1. I am an attorney licensed to practice in the State of California and before this Court. We represent Aleksandr Suris in the above-captioned matter. I submit this declaration in support of Mr. Suris' *ex parte* request to modify conditions of release.

2. Mr. Suris' bond has been posted at \$1.5 million, including deeding of two properties, one in Sherman Oaks, California, and the other in Big Bear, California. In addition, the bond restricts his travel to Los Angeles County, and he is under constant electronic monitoring via an ankle bracelet. Mr. Suris wishes to visit his property in Big Bear Lake, California, from September 27-30, 2019, for two reasons: to conduct required weather-proofing and otherwise "winterize" the property for the upcoming winter months, and to celebrate his 29<sup>th</sup> wedding anniversary with his family.

3. On September 13, 2019, I emailed Mr. Suris' Pretrial Services Officer, Michelle Reis, and advised her of Mr. Suris' requested travel. Officer Reis stated she does not oppose Mr. Suris' request. She also confirmed Mr. Suris' electronic monitoring via his ankle bracelet will work while he is in Big Bear Lake, California.

4. On September 9 and 17, 2019, I e-mailed the prosecutor assigned to this case, DOJ Trial Attorney Robyn Pullio, and advised her of the nature of this request. Ms. Pullio stated that the government opposes the requested travel but does not oppose the *ex parte* nature of this filing.

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